

RE: [EXTERNAL] - GRC - Payment of Caldwell claim

Christopher Moser <cmoser@qslwm.com>

Tue 11/9/2021 1:21 PM

To: kaz danesh <cancunkaz@hotmail.com>

Cc: Kimberly Hill <kimhill@qslwm.com>; ryan rouz <ryan@rouzlaw.com>; Rod Khavari <rod@dfwlawgroup.com>; Gregory Mitchell <gmitchell@freemanlaw.com>

Kaz,

I think the clear language of Section 4.10 of the plan requires me to pay Caldwell since his claim has been allowed and the 14 day appeal period has run. I can hold up paying him until tomorrow if you want to get a motion on file. If you file a motion I'll hold up paying him.

Chris

Christopher J. Moser |Chapter 7 Trustee |Attorney

Board Certified Business Bankruptcy Law and Consumer Bankruptcy Law

Texas Board of Legal Specialization

Quilling, Selander, Lownds, Winslett & Moser, P.C. | 2001 Bryan Street, Suite 1800, Dallas TX 75201

Direct: (214) 880-1805 | Fax: (214) 871-2111 | Email: cmoser@qslwm.com

From: kaz danesh <cancunkaz@hotmail.com>

Sent: Tuesday, November 9, 2021 1:13 PM

To: Christopher Moser <cmoser@qslwm.com>

Cc: Kimberly Hill <kimhill@qslwm.com>; ryan rouz <ryan@rouzlaw.com>; Rod Khavari <rod@dfwlawgroup.com>; Gregory Mitchell <gmitchell@freemanlaw.com>

Subject: Re: [EXTERNAL] - GRC - Payment of Caldwell claim

Chris, I am not asking you not to pay him. I am asking you to wait a few days to hear from me before doing so since GRC is on the brink of chapter 7. There are other provisions in section 4 that money should be paid to statebridge, trustee, bills, attorneys and to run the company that should take precedence before paying a unsecured creditor until my team puts forth a plan GRC needs money to take action.

Sent from my iPhone

On Nov 9, 2021, at 8:45 AM, Christopher Moser <cmoser@qslwm.com> wrote:

Kaz,

Caldwell asked to come by to pick up the check. How would you suggest that I justify not paying him as required by the plan?

Chris

Christopher J. Moser |Chapter 7 Trustee |Attorney

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Direct: (214) 880-1805 | Fax: (214) 871-2111 | Email: cmoser@qslwm.com

From: kaz danesh <cancunkaz@hotmail.com>

Sent: Monday, November 8, 2021 11:46 PM

To: Christopher Moser <cmoser@qslwm.com>; Kimberly Hill <kimhill@qslwm.com>; ryan rouz <ryan@rouzlaw.com>; Rod Khavari <rod@dfwlawgroup.com>; Gregory Mitchell <gmitchell@freemanlaw.com>

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Chris, can you please hold off on this payment till hearing from me on Thursday afternoon I'm working on a motion to sell and will incorporate disbursements into the motion.
Thanks

Sent from my iPhone

On Nov 8, 2021, at 10:12 PM, kaz danesh <cancunkaz@hotmail.com> wrote:

Sent from my iPhone

Begin forwarded message:

From: Christopher Moser <cmoser@qslwm.com>
Date: November 8, 2021 at 9:36:16 AM CST
To: Gregory Mitchell <gmitchell@freemanlaw.com>, "kaz danesh (cancunkaz@hotmail.com)" <cancunkaz@hotmail.com>, Rod Khavari <rod@dfwlawgroup.com>
Cc: Kimberly Hill <kimhill@qslwm.com>
Subject: FW: [EXTERNAL] - GRC - Payment of Caldwell claim

See below. Caldwell wants to be paid. I think Section 4.04.2 of the Plan obligates me to pay Caldwell's allowed claim. Let me know if you agree.

Chris

Christopher J. Moser | Chapter 7 Trustee | Attorney
Board Certified Business Bankruptcy Law and Consumer Bankruptcy Law
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Direct: (214) 880-1805 | Fax: (214) 871-2111 | Email: cmoser@qslwm.com

From: Robert Nicoud <rmnicoud@dallas-law.com>
Sent: Monday, November 8, 2021 8:20 AM
To: Christopher Moser <cmoser@qslwm.com>
Cc: John Caldwell <johndcaldwell@yahoo.com>
Subject: [EXTERNAL] - GRC - Payment of Caldwell claim

Chris:

The order allowing the claim of John Caldwell [Doc. 326] is now final.
Please forward the reserved amount in your escrow account to:

John D. Caldwell
1500 Pine Hills Lane
Corinth, TX 76210.

Please call or email with any questions.

Robert M. Nicoud, Jr.

Nicoud Law
10440 N. Central Expwy
Suite 800
Dallas, TX 75231
(214) 540-7542
(214) 265-6501 fax

Business Bankruptcy Law
Consumer Bankruptcy Law

<image001.gif>

<image002.png>

<Plan Second Amended (confirmed plan).pdf>